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May 17, 2021

**By ECF**

**MEMO ENDORSED**

The Honorable Sidney H. Stein  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St., Courtroom 23A  
New York, NY 10007

Re: *Quezada v. NYP Holdings, Inc.*, Case No. 1:21-cv-01407-SHS

Dear Judge Stein:

This firm is counsel to defendant NYP Holdings, Inc. ("NYP") in the above-referenced action. We write to request an additional extension of time for NYP to respond to the complaint in this action and for an adjournment of the initial pre-trial conference ("IPTC") currently scheduled for May 28, 2021. The parties have engaged in good-faith settlement discussions, which we hope will be fruitful, and Plaintiff has agreed to allow NYP additional time to continue its investigation of the condition of the website at issue.

We therefore write to request that the Court grant an extension of NYP's time to answer the complaint in this matter of 31 days, which will move the deadline from May 24, 2021, to June 24, 2021, and also to respectfully request that the IPTC be adjourned to or a date after June 25, 2021, so that the parties can form a discovery plan after issue is joined. This is the third request for an extension of NYP's time to answer and the first request to adjourn the IPTC. The Court granted the first and second requests. Plaintiff has consented to these requests.

We are grateful for the Court's attention to this matter.

Respectfully submitted,

Davis Wright Tremaine LLP

Christopher L. Donati

cc: Mars Khaimov, Esq.

**The last day for defendant to respond to the complaint is extended to June 24, 2021. The initial conference is adjourned to June 25 at 12:30 p.m.**

Dated: New York, New York  
May 18, 2021

**SO ORDERED:**

  
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Sidney H. Stein, U.S.D.J.

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